

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

PLANNED PARENTHOOD OF GREATER WASHINGTON AND NORTH IDAHO; PLANNED PARENTHOOD OF THE GREAT NORTHWEST AND THE HAWAIIAN ISLANDS; and PLANNED PARENTHOOD OF THE HEARTLAND,

## Plaintiffs,

V.

U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES and ALEX MICHAEL  
AZAR II in his official capacity  
as Secretary of the U.S.

as Secretary of the U.S.  
Department of Health and Human  
Services,

### Defendants.

NO. 2:18-cv-00055

**DECLARATION OF  
DR. MELINDA GIOVENGO ON  
BEHALF OF YOUTHCARE IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTIVE RELIEF**

**DECLARATION OF DR. MELINDA GIOVENGÖ**  
**ON BEHALF OF YOUTHCARE**

I, Dr. Melinda Giovengo, on behalf of YouthCare, hereby declare the following under penalty of perjury:

1. I am the Chief Executive Officer & President of YouthCare.

YouthCare is a not-for-profit corporation organized under the laws of Washington. YouthCare serves homeless youth ages 12 to 24 in the Greater Seattle Area. YouthCare provides outreach, basic services, emergency shelter, housing, counseling, education, and employment training.

2. This declaration is based upon my personal knowledge, my review of YouthCare's business records, and the knowledge I have acquired in the course of my duties with YouthCare. If called and sworn as a witness, I could and would testify competently thereto.

3. A majority of individuals served by YouthCare are youth of color

1 and/or identify as LGBTQ; and they are disproportionately impacted by sexual  
2 violence, trauma, and exploitation. Prior to encountering YouthCare, many have  
3 received little, or no, sexual education.

4       4. YouthCare partnered with Planned Parenthood of the Great Northwest  
5 and the Hawaiian Islands (PPGNHI) to deliver to youth and staff a Teen Pregnancy  
6 Prevention Program (TPPP) called Stronger Together.

7       5. The TPPP is an evidence-based sexual health program that teaches  
8 youth about their sexuality, anatomy and physiology, contraception, and sexually  
9 transmitted infections. The TPPP training approaches the subject matter through a  
10 positive lens, and creates a safe and judgment-free space for youth to learn without  
11 shame.

12       6. Through Stronger Together, YouthCare and PPGNHI were able to  
13 provide YouthCare staff with comprehensive training, and were working to build a  
14 customized curriculum tailored to the unique needs of minors experiencing  
15 homelessness.

16       7. Planned Parenthood has been a diligent partner in customizing a  
17 curriculum that is inclusive to all of the youth we serve, with a focus on three key  
18 areas: increasing condom usage, increasing communication and agency in sexual  
19 encounters, and decreasing alcohol use. This shared work has been critical to  
20 prioritizing sexual education at YouthCare and giving young people the space and  
21 support to explore their bodies and values.

22       8. Based on the success of its initial sessions, YouthCare, through its  
23 partnership with Planned Parenthood, planned to continue regularly scheduled  
24 sessions of the Stronger Together program.

25       9. If YouthCare loses the benefit of this partnership, the program will  
26 terminate.

27  
28

1  
2 Dated: March 13, 2018  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ Dr. Melinda Giovengo  
Melinda Giovengo, PhD  
CEO & President, YouthCare